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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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UNITED STATES OF AMERICA,	:	<u>Sealed</u>
	:	<u>FELONY</u>
Plaintiff,	:	<b>COMPLAINT</b>
	:	Case No. 2:20mj524 DAO
vs.	:	
	:	VIOLATION:
CHRISTOPHER ISIDRO ROJAS,	:	
Defendant.	:	Count 1: 18 U.S.C. § 844(i), Arson
	:	in Interstate Commerce
	:	
	:	Magistrate Judge Daphne A. Oberg

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Before the Honorable Daphne A. Oberg, United States Magistrate Judge for the  
District of Utah, appeared the undersigned, who on oath deposes and says:

**COUNT 1**  
18 U.S.C. § 844(i)  
[Arson in Interstate Commerce]

On or about May 30, 2020, in the District of Utah,

CHRISTOPHER ISIDRO ROJAS,

Defendant herein, maliciously damaged and destroyed, and attempted to maliciously damage and destroy, by means of fire and explosives, a vehicle, to wit: a Salt Lake City Police Department patrol car, used in interstate commerce and in activities affecting interstate commerce, and did aid and abet therein; all in violation of 18 U.S.C. §§ 844(i) and 2.

**AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT**

Complainant, JEFFREY T. WRIGHT, being duly sworn, hereby states:

1. I, Jeffrey T. Wright, am a Special Agent with the United States Department of Justice, Federal Bureau of Investigation, and have been employed in that capacity for approximately 12 years. I am currently assigned to the Salt Lake City Division of the FBI and have primary investigative responsibility for federal crimes related to national security and domestic terrorism. I gained experience in the conduct of such investigations through previous case investigations, formal training, and in consultation with law enforcement partners in local, state and federal law enforcement agencies. I have been trained to investigate federal crimes and have investigated an array of complex federal crimes.
2. The statements in this affidavit are based, in part, on information provided by law enforcement officers, other investigators with knowledge of this investigation, and witnesses who observed the incident, as well as information obtained from the State of Utah. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint I have not included every fact known to me concerning this investigation. Rather, I have set forth only the facts necessary to establish probable

cause for the complaint.

### **Statement of Probable Cause**

3. On May 30, 2020, protestors took to the streets of Salt Lake City, Utah, to call for justice after the killing of George Floyd on May 25, 2020 in Minneapolis, Minnesota. Some of the protestors in Salt Lake City were non-residents of Utah.
4. Similar protests occurred in other cities across the United States in the days following May 25, 2020. Some of the protests devolved into vandalism, property damage, arson and other riotous acts.
5. The downtown area of Salt Lake City, Utah hosts myriad companies, commercial properties, retail establishments, restaurants, gas stations, public facilities and other businesses that were open for business on May 30, 2020, during the time of the protest.
6. During the protest, Salt Lake City Police Officers and other law enforcement personnel were deployed throughout the downtown area to protect individuals, businesses, and property. Police officers used law enforcement vehicles throughout the protest to transport law enforcement personnel, to provide emergency aid and assistance, and to serve as a resource for crowd control measures.
7. The Salt Lake City Police Department regularly conducts business in interstate commerce, for instance, by purchasing vehicles and other equipment and supplies in interstate commerce. The activities of the Salt Lake City Police Department in enforcing laws and responding to emergencies also affect interstate commerce.

8. On the afternoon of May 30, 2020, the peaceful protest in downtown Salt Lake City devolved into acts of destruction and violence.
9. More specifically, on the afternoon of May 30, 2020, Salt Lake City Police Officer A.L. drove her patrol car east on 400 South in Salt Lake City en route to the Public Safety Building. After driving through the intersection of 200 East and 400 South, protesters boxed-in and immobilized her patrol car. Fearing for her safety, Officer A.L. was forced to flee from her patrol car. Subsequently, rioters overturned her patrol car, vandalized it, and set it on fire.
10. Video footage from various sources shows individual rioters using fire and explosives to damage and destroy the patrol car.
11. The patrol car was engulfed in flames, as shown in the photograph below:

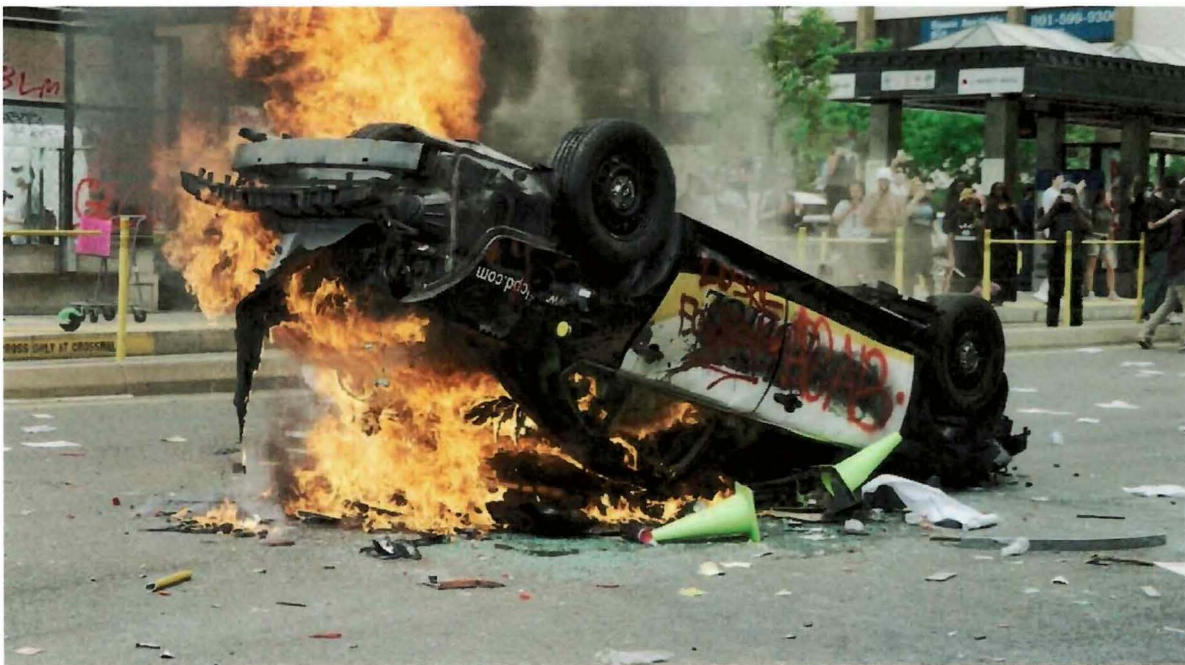


Exhibit 1



12. The patrol car was completely destroyed by fire, as shown in the exhibit below:



Exhibit 2

13. On May 31, 2020, ATF Special Agent Certified Fire Investigator Candidate Tyler Olson and Salt Lake City Fire Investigators examined the destroyed patrol car. The patrol car is a Chevrolet Impala. From the physical examination of the vehicle, and video and photographic evidence, it is SA Olson's opinion that the destruction of the patrol car was incendiary in nature.

14. The patrol car was identified as a 2010 Chevrolet Impala Police Car, bearing Vehicle Identification Number 2G1WD5EM5A1149042, and further identified as Salt Lake

City patrol car 40551. The patrol car was purchased by Salt Lake City on October 19, 2009, from Young Chevrolet Company in Layton, Utah. The patrol car was manufactured at the Oshawa Car Assembly Plant in Oshawa, Ontario, Canada.

15. Officer A.L. utilized the patrol car daily in the performance of her official duties, to include responding to emergencies and to various calls for service. Dispatch calls included, but were not limited to, responding to fights in progress, domestic violence, 911 hang-ups, rendering aid, assisting with transients (some of whom were not Utah residents), and responding to shoplifting and property crimes at businesses in the city.
16. Officer A.L. utilized the patrol car in enforcing traffic laws, including responding to traffic accidents on interstate highways. Officer A.L. often utilized her assigned patrol vehicle to transport arrestees via the interstate highways and has cited multiple out-of-state residents.
17. Officer A.L. used the patrol car for daily access, via a mounted laptop computer, to law enforcement databases, to include the National Crime Information Center (NCIC). She utilized these databases to ascertain the identities of persons and to obtain ownership information of vehicles she encountered during the performance of her official law enforcement duties. Access to these databases via the patrol car's mounted laptop required the use of the internet.
18. Video footage from May 30, 2020, shows an individual, later identified by police as CHRISTOPHER ISIDRO ROJAS, wearing an unbuttoned black and red flannel shirt over a gray t-shirt, a dark-colored baseball cap worn backwards, and a medical-style

face mask. ROJAS appears to have long hair and a beard. See Exhibit 3 below:



Exhibit 3

19. ROJAS is holding a cigarette lighter in his hands while standing next to an African American man wearing a black Nike hoodie and black Nike sweatpants. The African American man is wearing a gasmask on his face. The man wearing the gasmask is holding white fabric, perhaps a tablecloth or bedsheet. ROJAS and the man wearing the gasmask work together to light the white fabric on fire. See exhibits 4 and 5 below.



Exhibit 4





Exhibit 5

20. Once the fabric begins to burn, the man in the gasmask throws the burning fabric towards the overturned patrol car. See Exhibit 6 below:

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Exhibit 7

21. The burning cloth landed partially in the interior of the patrol car and partially on the street. See Exhibit 8 below:

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Exhibit 8

22. ROJAS is later recorded by video at the riot stating “I put the cop car on fire. It didn’t blow up.” See Exhibit 9 below:

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Exhibit 9

23. In June of 2020, Salt Lake City Police Department sought help from the public in identifying the man who claimed to have “put the cop car on fire.” Starting on or about June 26, 2020, and continuing for the next several days, investigators received multiple tips identifying the man in the plaid shirt as Christopher ROJAS.

24. Investigators located a recent newspaper article in which ROJAS was interviewed and identified. At least one of the tipsters stated that ROJAS was aware that the FBI was searching for him and stated that ROJAS was limiting his online profile by deleting



accounts.

25. Investigators subsequently confirmed the suspect is CHRISTOPHER ISIDRO ROJAS based on his driver's license photo and a booking photo, together with comparisons of distinctive identifiers including a mole on ROJAS's neck and ROJAS' shoes at the riot which ROJAS was later photographed wearing at a local pub. See Exhibits 10 and 11 below:

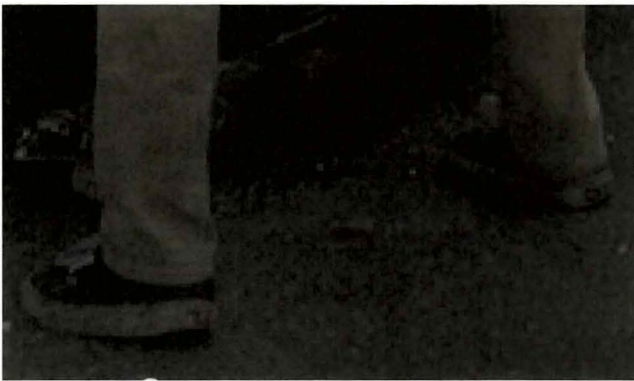


Exhibit 10



Exhibit 11

26. Based on the foregoing information, I respectfully request an arrest warrant be issued for CHRISTOPHER ISIDRO ROJAS for a violation of 18 U.S.C. § 844(i).

I swear that this information is true and correct to the best of my knowledge,

information, and belief.

DATED this 10<sup>th</sup> day of July 2020.



JEFFREY T. WRIGHT  
FBI Special Agent

Approved as to form:

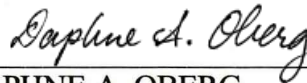
JOHN W. HUBER  
United States Attorney



MICHAEL J. THORPE  
Assistant United States Attorney

The affiant appeared before me by telephonic conference on this date pursuant to Fed.

R. Crim. P. 4.1 and affirmed under oath the content of this affidavit and application.



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DAPHNE A. OBERG  
United States Magistrate Judge  
District of Utah